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October 9, 2000

Ms. Callie Bolattino
On-Scene Coordinator
USEPA, Emergency Response Branch, Region 5
77 West Jackson Boulevard (SE-5J)
Chicago, Illinois 60640

Subject: Riverdale Chemical Company
Monthly Progress Report - (September)

Dear Callie:

Riverdale Chemical Company is submitting the September Monthly Progress Report per the requirements of the draft Administrative Order on Consent, Section V: Order, Part 2.4: Reporting. Please contact Riverdale with any questions or comments.

Sincerely,

Dr. Peter Bibby

Attachments: Monthly Progress Report

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Monthly Progress Report Riverdale Chemical Company

Site Name/Activity:
Riverdale Chemical Company
Phase I Removal Action

Date: October 9, 2000

Reporting Period: September 2000

Prepared for:
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Riverdale initiated work at the site in June 2000 to meet requirements of the construction schedule for facility improvements mandated by the Illinois Department of Agriculture. The construction areas (Figure 1) include: 1) installation of upgraded secondary containment around the liquid storage area (liquid storage area); 2) expansion of the raw materials warehouse (raw materials warehouse); 3) installation of a spill containment basin and 20,000 gallon storage basin at the railroad unloading area (railroad unloading area). Riverdale notified the USEPA of the planned activities and is continuing to negotiate an Administrative Order of Consent with the USEPA. This Monthly Progress Report (MPR) summarizes the activities completed at the site through September 2000. The work was conducted with oversight by the USEPA under the Emergency Response program.

1. Progress Made This Reporting Period:

- a) Completed the removal action at the raw materials warehouse
 - On June 28th, sixteen (16) soil samples were collected (locations SL01 through SL11) and analyzed for pesticide compounds of potential concern (COPCs). The COPCs are heptachlor, aldrin, heptachlor epoxide, dieldrin, alpha-chlordane, gamma-chlordane and toxaphene. A summary of the Sampling Program is provided in Table 1.
 - On August 8th, eight (8) soil samples were collected (locations SL25 through SL28). These samples were not analyzed, additional samples were collected on August 24th.
 - On August 24th, eight (8) soil samples were collected (locations SL33 through SL36) and analyzed for pesticide COPCs.
 - On September 6th, the soils under the raw materials warehouse (40 feet by 25 feet to a depth of 5 feet) were excavated.
 - On September 6th, four (4) soil samples (confirmation) were collected (locations SL56 through SL59) and analyzed for pesticide COPCs.
 - On September 6th, two (2) samples, DSL3 and DSL4, were collected from the excavated soil stockpiles for TCLP characterization.
 - On September 11th, one (1) sample, DSL6, was collected from the excavated soil stockpiles for TCLP pesticide characterization.

- On September 15th, one (1) sample, DSL7, was collected from the excavated soil stockpiles for TCLP pesticide characterization.
- On September X, approximately 1613.30 tons of soil excavated from the raw material storage area were shipped for off-site disposal at Laraway Landfill in Illinois.

b) Completed the removal action at the railroad unloading area

- On August 21st through August 24th, the excavation for the 20,000 gallon storage basin at the railroad unloading area (20 feet by 100 feet to a depth of 7.2 feet) was conducted.
- On August 23rd, one (1) sample, DSL1, was collected from the excavated soil stockpiles for TCLP pesticide characterization.
- On August 24th, three (3) soil samples (confirmation) were collected from the base of 20,000 gallon storage basin (SL37 through SL39) and analyzed for pesticide COPCs.
- On August 28th, the excavation of the spill containment basin (20 feet by 60 feet to a depth of 5 feet) was completed.
- On August 28th, two (2) soil samples (confirmation) were collected from the base of the spill containment basin (SL40 through SL41) and analyzed for pesticide COPCs.
- On September 8th, an additional three feet of soil was excavated from the spill containment basin (20 feet by 60 feet to a depth of 8 feet).
- On September 8th, two (2) soil samples were collected from the spill containment basin (SL60 through SL61) and analyzed for pesticide COPCs.
- On September 8th, one (1) sample, DSL5, was collected from the excavated soil stockpiles for TCLP pesticide characterization. The sample was submitted for dioxin analysis on September 18th.
- In September, approximately 2264.29 tons of soil excavated from the railroad unloading area were shipped for off-site disposal at Laraway Landfill in Illinois.

c) Conducted sampling at the liquid storage area

- On July 3rd, thirteen (13) soil samples were collected (locations SL12 through SL20) and analyzed for pesticide COPCs.
- On August 8th, six (6) soil samples were collected (locations SL20 through SL24). These samples were not analyzed.
- On August 31st, nine (9) soil samples were collected (locations SL44 through SL47) and analyzed for pesticide COPCs.
- On September 26th, eight (8) soil samples were collected (locations SL68 through SL75) and analyzed for pesticide COPCs. Two samples were analyzed for dioxin (SL68 and SL71).
- On September 26th, two (2) soil samples were collected (DSL8 and DSL9) for disposal characterization. One sample was analyzed for dioxin (DSL8).
- In September, approximately 1214.97 tons of soil excavated from the liquid storage area were shipped for off-site disposal at Laraway Landfill in Illinois .

d) Completed sampling at the utility area

- On September 21st, twelve (12) soil samples were collected (locations SL62 through SL67) and analyzed for pesticide COPCs.

- e) Completed sampling at the low lying area
 - On August 31st, eleven (11) soil samples were collected (locations SL50 through SL55) and analyzed for full TCL and TAL analysis. Two samples were analyzed for high resolution dioxin (SL53 and SL54).
 - f) Completed sampling at the Hartwell Building expansion
 - On August 31st, four (4) soil samples were collected (locations SL48 through SL49) and analyzed for pesticide COPCs
2. Documents Submitted This Reporting Period:
- a) On July 14, 2000, the Field Sampling and Analysis Plan for the Liquid Storage Area was submitted to USEPA for review and comment.
 - b) On July 28, 2000, the Draft Phase I Removal Action Workplan was submitted to the USEPA for review and comment
 - c) On September 15, 2000, the Revised Draft Phase I Removal Action Workplan was submitted to the USEPA for review and comment

3. Analytical Data Transmitted With This Report:

USEPA has requested that Riverdale provide data packages for TCL Pesticide list rather than Pesticide COPCs for samples collected after August 27th. Riverdale is complying with this request and for all CLP data packages the TCL Pesticide list will be provided. Due to longer turnaround times associated with CLP data packages, Riverdale had samples analyzed for both SW846 analysis (3 -5 day turnaround) and standard CLP package (30 day turnaround). Several of the SW846 analyses for Pesticide COPCs are provided with this submittal, the corresponding CLP data package will include the TCL Pesticide list.

- a) CLP Analytical Data Package (Pesticide COPCs) for fifteen soil samples (SL02, SL03, SL04, SL05, SL06, SL07, SL08, SL09, SL10 and SL11) collected 6/28
- b) CLP Analytical Data Package (2,3,7,8 TCDD) for five soil samples (SL03, SL09, SL15, SL16 and SL17) collected 6/28
- c) CLP Analytical Data Package (Pesticide COPCs) for one soil sample (SL01) collected 6/28
- d) CLP Analytical Data Package (Pesticide COPCs) for thirteen soil samples (SL12, SL13, SL14, SL15, SL16, SL17, SL18, SL19, and SL20) collected 7/3.
- e) TCLP Characterization Data Package for two samples (DSL1 and DSL2) collected 8/23.
- f) SW846 8081A Data Package for eleven soil samples (SL33-1.2, SL33-3.5, SL34-1.2, SL34-3.5, SL35-1, SL35-4.5, SL36-1.2, SL36-4.5, SL37-6.2, SL38-6.2, and SL39-6.2) collected 8/24
- g) SW846 8081A Data Package for two soil samples (SL40-5.2 and SL41-5.2) collected 8/28
- h) TCLP Characterization Data Package for three samples (DSL3, DSL4, and DSL5) collected 9/6
- i) SW846 8081A Data Package for four soil samples (SL56-5, SL57-5, SL58-5 and SL59-2) collected 9/06
- j) TCLP Characterization Data Package for one sample (DSL6) collected 9/11
- k) TCLP Characterization Data Package for one sample (DSL7) collected 9/15

4. Anticipated Progress During the Next Reporting Period:

- The Phase I Removal Action Report is currently being prepared.
- The analytical results of sampling at the Phase II liquid storage area (SL17 and pipeline run), the low lying area, and the utility area are anticipated to be available in October.
- Additional sampling in the Liquid Storage Area (SL17 area) is proposed to be conducted in October to define the impacted area prior to the removal action. Based on the construction schedule previously provided to the USEPA, the excavation of impacted soil is anticipated to occur in November, consistent with the Phase 2 construction (east side) of the Liquid Storage Area.
- Data validation (10%) will begin once all analytical results are received.

5. Agency Reviews/Approvals Pending:

- The USEPA is currently reviewing the Revised Draft Phase I Removal Action Workplan

6. Anticipated Potential Problems and Recommendations:

- There are no anticipated problems to resolve in October.

7. Resolution of Previous Problems:

- There were no problems to be resolved during the previous reporting period.

8. Personnel Changes:

- There were no personnel changes in September.

9. Schedule:

The schedule of upcoming activities is provided below:

<u>Deliverable/Meeting</u>	<u>Completion Date</u>
Field Activities and Sampling	November 30, 2000
Excavation and Disposal of Contaminated Soil	November 30, 2000
Submittal of Draft Phase I Removal Action Report	November 30, 2000
Resubmittal of Draft Phase I Removal Action Report	30 Days after receipt of USEPA Comments

Attachments: Table 1, Summary of Sampling Program
Figure 1, Sampling Locations
Analytical Data

Table 1
Summary of the Sampling Program

SAMPLE ID	SAMPLE LOCATION	SAMPLE DATE	ANALYSIS
SL01 - 4 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL02 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL02 - 5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL03 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL04 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL05 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL06 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL07 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL07 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL08 - 2.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL08 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL09 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL10 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL10 - 5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL11 - 3 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL11 - 4.5 FT	Raw Materials Warehouse	6/28/2000	Pesticides COPCs
SL12 - 1 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL12 - 3.5 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL13 - 1.5 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL13 - 3.5 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL14 - 3 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL15 - 3 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL16 - 1 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL17 - 1 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL17 - 3 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL18 - 2.5 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL19 - 1 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL20 - 2 FT	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL20 - 2 FT DUP	Phase I & II: Liquid Storage Area	7/3/2000	Pesticides COPCs
SL21 - 1 FT	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹
SL22 - 1 FT	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹
SL22 - 2 FT	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹
SL23 - 1 FT	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹

Table 1
Summary of the Sampling Program

SAMPLE ID	SAMPLE LOCATION	SAMPLE DATE	ANALYSIS
SL24 - 1 FT	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹
SL24 - 1 FT DUP	Phase I & II: Liquid Storage Area	8/8/2000	Not Analyzed ¹
SL25 - 2 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL25 - 4 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL26 - 2 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL26 - 4 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL27 - 2 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL27 - 4 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL28 - 2 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL 28 - 4 FT	Raw Materials Warehouse	8/8/2000	Not Analyzed ¹
SL29 - 10 FT	Phase I: Liquid Storage Area	8/18/2000	Not Analyzed ²
SL30 - 10 FT	Phase I: Liquid Storage Area	8/18/2000	Not Analyzed ²
SL31 - 10 FT	Phase I: Liquid Storage Area	8/18/2000	Not Analyzed ²
SL32 - 10 FT	Phase I: Liquid Storage Area	8/18/2000	Not Analyzed ²
SL33 - 1.2 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL33 - 3.5 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL34 - 1.2 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL34 - 3.5 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL35 - 1 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL35 - 4.5 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL36 - 1.2 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL36 - 4.5 FT	Raw Materials Warehouse	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL37 - 6.2 FT	Railroad Unloading Storage Basin	8/23/2000	SW846 Pesticide COPCs
		8/23/2000	CLP Pesticide
SL38 - 6.2 FT	Railroad Unloading Storage Basin	8/23/2000	SW846 Pesticide COPCs

Table 1
Summary of the Sampling Program

SAMPLE ID	SAMPLE LOCATION	SAMPLE DATE	ANALYSIS
		8/23/2000	CLP Pesticide
SL39 - 6.2 FT	Railroad Unloading Storage Basin	8/24/2000	SW846 Pesticide COPCs
		8/24/2000	CLP Pesticide
SL40-5.2FT	Railroad Unloading Spill Containment Basin	8/28/2000	SW846 Pesticide COPCs
		8/28/2000	CLP Pesticide
SL41-5.2FT	Railroad Unloading Spill Containment Basin	8/28/2000	SW846 Pesticide COPCs
		8/28/2000	CLP Pesticide
SL41-5.2FT-DUP	Railroad Unloading Spill Containment Basin	8/28/2000	CLP Pesticide
SL44-1FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL44-4FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL45-1FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL45-4FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL46-1FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL46-4FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL47-1FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL47-4FT	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL47-DUP	Phase II: Liquid Storage Area	8/31/2000	CLP Pesticide
SL48-1FT	Hartwell Building Expansion	8/31/2000	CLP Pesticide
SL48-4FT	Hartwell Building Expansion	8/31/2000	CLP Pesticide
SL49-1FT	Hartwell Building Expansion	8/31/2000	CLP Pesticide
SL49-4FT	Hartwell Building Expansion	8/31/2000	CLP Pesticide
SL50-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL50-4FT	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL51-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL51-4FT	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL52-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL52-4FT	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL53-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
		8/31/2000	Dioxin - 8290
SL54-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
		8/31/2000	Dioxin - 8290
SL55-6IN	Low Lying Area	8/31/2000	CLP: VOA, Metals, Semi-VOA, Pesticide,Herbicides
SL56-5FT	Raw Materials Warehouse	9/6/2000	SW846 Pesticide COPCs

Table 1
Summary of the Sampling Program

SAMPLE ID	SAMPLE LOCATION	SAMPLE DATE	ANALYSIS
		9/6/2000	CLP Pesticide
SL57-5FT	Raw Materials Warehouse	9/6/2000	SW846 Pesticide COPCs
		9/6/2000	CLP Pesticide
SL58-5FT	Raw Materials Warehouse	9/6/2000	SW846 Pesticide COPCs
		9/6/2000	CLP Pesticide
SL59-5FT	Raw Materials Warehouse	9/6/2000	SW846 Pesticide COPCs
		9/6/2000	CLP Pesticide
SL60-5FT	Railroad Unloading Spill Containment Basin	9/8/2000	CLP Pesticide
SL61-5FT	Railroad Unloading Spill Containment Basin	9/8/2000	CLP Pesticide
SL62-1FT	Utility Area	9/21/2000	CLP Pesticide
SL62-4FT	Utility Area	9/21/2000	CLP Pesticide
SL63-1FT	Utility Area	9/21/2000	CLP Pesticide
SL63-4FT	Utility Area	9/21/2000	CLP Pesticide
SL64-1FT	Utility Area	9/21/2000	CLP Pesticide
SL64-4FT	Utility Area	9/21/2000	CLP Pesticide
SL65-1FT	Utility Area	9/21/2000	CLP Pesticide
SL65-4FT	Utility Area	9/21/2000	CLP Pesticide
SL66-1FT	Utility Area	9/21/2000	CLP Pesticide
SL66-4FT	Utility Area	9/21/2000	CLP Pesticide
SL67-1FT	Utility Area	9/21/2000	CLP Pesticide
SL67-4FT	Utility Area	9/21/2000	CLP Pesticide
SL68-8FT	Pipeline Run	9/26/2000	Dioxin - 8280
SL69-8FT	Pipeline Run	9/26/2000	CLP Pesticide
SL70-8FT	Pipeline Run	9/26/2000	CLP Pesticide
SL71-8FT	Pipeline Run	9/26/2000	Dioxin - 8280
SL72-8FT	Pipeline Run	9/26/2000	CLP Pesticide
SL73-8FT	Pipeline Run	9/26/2000	CLP Pesticide
SL74-8FT	Pipeline Run	9/26/2000	CLP Pesticide
SL75-8FT	Pipeline Run	9/26/2000	CLP Pesticide
DSL1	Railroad Unloading Area	8/23/2000	Full TCLP
DSL2	Phase I: Liquid Storage Area	8/23/2000	Full TCLP
DSL3	Raw Materials Warehouse (Potential)	9/6/2000	Full TCLP
DSL4	Raw Materials Warehouse (Contaminated)	9/6/2000	Full TCLP

Table 1
Summary of the Sampling Program

SAMPLE ID	SAMPLE LOCATION	SAMPLE DATE	ANALYSIS
DSL5	Railroad Unloading Spill Containment Basin (8 FT)	9/8/2000	Full TCLP
		9/18/2000	Dioxin - 8280
DSL6	Raw Materials Warehouse (Small Pile)	9/11/2000	TCLP Pesticides
DSL7	Raw Materials Warehouse (Under Concrete)	9/15/2000	TCLP Pesticides
DSL8	Pipeline Run (1-4FT)	9/26/2000	TCLP Pesticides
		9/26/2000	Dioxin - 8280
DSL9	Pipeline Run (4-8FT)	9/26/2000	TCLP Pesticides

¹ These samples were not analyzed due to problems with laboratory. Additional locations were chosen and samples submitted for analysis.

² These samples were not analyzed per discussions with the USEPA.

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The item(s) listed below are not available in SDMS. In order to view original document or document pages, contact the Superfund Records Center.

SITE NAME	RIVERDALE CHEMICAL		
DOC ID #	142951		
DESCRIPTION OF ITEM(S)	SITE MAP OF SAMPLE LOCATIONS		
REASON WHY UNSCANNABLE	<u> X </u> OVERSIZED	OR	<u> </u> FORMAT
DATE OF ITEM(S)	NONE		
NO. OF ITEMS	1		
PHASE	SAN / ERR		
PRP	RMD - RIVERDALE CHEMICAL		
PHASE (AR DOCUMENTS ONLY)	<u> </u> Remedial <u> </u> Removal <u> </u> Deletion Docket <u> </u> AR <u> </u> Original <u> </u> Update # <u> </u> Volume <u> </u> of <u> </u>		
O.U.			
LOCATION	Box # <u> </u> Folder # <u> </u> Subsection <u> </u>		
COMMENT(S)			